

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**JOHN DOE,**

**Plaintiff,**

**v.**

**HAVERFORD COLLEGE,  
COACH 1,  
CAPTAIN A, AND  
STUDENT 1,**

**Defendants.**

**CIVIL ACTION NO. 2:23-cv-00299-GAM**

**JURY TRIAL DEMANDED**

**DEFENDANT CAPTAIN A'S ANSWER TO CROSSCLAIM OF STUDENT 1**

Defendant Captain A, by and through his attorney, Joseph McCool, hereby answers the crossclaim asserted against him by Student 1 as follows:

1. Defendant Captain A incorporates all his responses to Plaintiff's Amended Complaint as though fully set forth at length herein.

2. Denied. The averments of this paragraph are denied as conclusions of law.

3. Denied. The averments of this paragraph are denied as conclusions of law.

**WHEREFORE**, Answering Defendant respectfully requests this Honorable Court dismiss Plaintiff's claims with prejudice and enter judgment in favor of Defendant Captain A and against Plaintiff together with attorney' fees, costs and such other further relief as this Court deems equitable and just. Furthermore, Answering Defendant denies that he is liable on Plaintiff's causes of action and denies he is liable over to Student 1 on her cross-claim and avers that co-defendants Haverford College, Coach 1 and/or Student 1 are solely liable to Plaintiff and/or jointly and/or severally liable or are liable over to Answering Defendant on Plaintiff's

causes of action or are liable over to Answering Defendant by way of contribution and indemnity.

Dated: July 18, 2023

Respectfully submitted,

**MONTGOMERY MCCracken Walker &  
Rhoads LLP**

By: /s/ Joseph McCool  
PA ID. No. 206593  
1735 Market Street, 19<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 772-1500  
Email: [jmccool@mmwr.com](mailto:jmccool@mmwr.com)

*Attorneys for Defendant Captain A*

**CERTIFICATE OF SERVICE**

I, Joseph McCool, certify that I electronically filed the foregoing Defendant Captain A's Answer to Crossclaim of Student 1 with the Clerk of Court via CM/ECF, which will automatically send notification of such filing to all counsel of record:

Patricia M. Hamill, Esquire  
Andrew S. Gallinaro, Esquire  
Clark Hill  
Two Commerce Square, 2001 Market Street  
Suite 2620  
Philadelphia, PA 19103

Josh W.B. Richards, Esquire  
Saul Ewing LLP  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102

Kevin M. Siegel, Esquire  
The Law Offices of Kevin M. Siegel  
One Greentree Centre  
10,000 Lincoln Drive East – Suite 201  
Marlton, NJ 08053

Date: July 18, 2023

/s/ Joseph McCool  
Joseph McCool

*Counsel for Defendant Captain A*